



BellSouth Telecommunications, Inc.

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December 1, 2000

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Interconnection Agreement Negotiations Between AT&T
Communications of the South Central States, Inc. TCG MidSouth, Inc.
and BellSouth Telecommunications, Inc. Pursuant to 47 U.S.C. § 252
Docket No. 00-00079*

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's Objection to AT&T's First Set of Interrogatories and Request for Production of Documents. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,

Guy M. Hicks

GMH:ch
Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Interconnection Agreement Negotiations Between AT&T
Communications of the South Central States, Inc. TCG MidSouth, Inc.
and BellSouth Telecommunications, Inc. Pursuant to 47 U.S.C. § 252*

Docket No. 00-00079

BELLSOUTH TELECOMMUNICATIONS, INC.'S
OBJECTIONS TO AT&T'S FIRST SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS

BellSouth Telecommunications, Inc., ("BellSouth") pursuant to the Tennessee Regulatory Authority's Notice of Procedural Schedule issued in this docket on October 27, 2000, hereby serves its Objections to AT&T of the South Central States, Inc.'s ("AT&T") First Set of Interrogatories and Request for Production of Documents to BellSouth Telecommunications, Inc. dated November 27, 2000, and states as follows:

I. GENERAL OBJECTIONS

1. BellSouth objects to the interrogatories and request for production of documents to the extent they seek to impose an obligation on BellSouth to respond on behalf of its parent, affiliates, or other persons that are not parties to this case on the grounds that such request is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth objects to the interrogatories and request for production of documents to the extent they are intended to apply to matters other than Tennessee intrastate operations subject to the jurisdiction of the Authority. BellSouth objects to such interrogatories and request for production of documents as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to AT&T's interrogatories and request for production of documents, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Authority's procedural rules, the Tennessee Rules of Civil Procedure or other applicable Tennessee statutes.

4. BellSouth is a large corporation with employees located in many different locations in Tennessee and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Authority or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these interrogatories and requests for production of documents. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the interrogatories and requests for production of documents purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

5. Rule 1220-1-2-.11(5)(a) of the Tennessee Regulatory Authority limits each party to no more than 40 discovery requests without the prior approval of the Authority or a Hearing Officer. In this case AT&T has served 82 such requests, not counting sub-parts, without such approval. BellSouth objects to these discovery requests to the extent that they violate the cited rule.

II. SPECIFIC OBJECTIONS TO INTEROGATORIES

Subject to the foregoing general objections to AT&T's First Interrogatories and Requests for Production of Documents, BellSouth makes the following specific objections to the individual interrogatories:

REQUEST 25: Please state whether BellSouth has a time frame for issuing clarifications, jeopardy notices, and rejections from the time of the receipt of the LSR. If yes, please provide the time frame(s) and a detailed explanation for these time frames.

OBJECTION: BellSouth objects to this interrogatory on the grounds that AT&T is seeking information that is only relevant to issues that relate to performance measures and such issues are not being arbitrated in this proceeding. Therefore, this interrogatory will not lead to the discovery of evidence that is either relevant to or will lead to the discovery of admissible evidence related to the remaining issues in this proceeding. If AT&T will identify the issue or issues remaining in this proceeding that this interrogatory relates to, together with an explanation of why the information requested is either relevant to or likely lead to the discovery of admissible evidence related to such issues, BellSouth would reconsider its position. Until that occurs, however, BellSouth objects to taking the time and incurring the expense of responding to interrogatories that, on their face, do not relate to this docket.

REQUEST 26: Describe in detail the methodology utilized by BellSouth to calculate the "Percent Flow Through Service Requests Report"

and "LNP Percent Flowthrough Service Requests Report" for service requests submitted on or after September 1, 2000, including a description of any changes to that methodology that have been implemented since that date. Include descriptions for all sub-sections of each report (Summary, Detail, Residence Detail, Business Detail, UNE Detail, Flowthrough Error Analysis, LNP Summary, and LNP Aggregate Detail).

OBJECTION:

BellSouth objects to this interrogatory on the grounds that AT&T is seeking information that is only relevant to issues that relate to performance measures and such issues are not being arbitrated in this proceeding. Therefore, this interrogatory will not lead to the discovery of evidence that is either relevant to or will lead to the discovery of admissible evidence related to the remaining issues in this proceeding. If AT&T will identify the issue or issues remaining in this proceeding that this interrogatory relates to, together with an explanation of why the information requested is either relevant to or likely lead to the discovery of admissible evidence related to such issues, BellSouth would reconsider its position. Until that occurs, however, BellSouth objects to taking the time and incurring the expense of responding to interrogatories that, on their face, do not relate to this docket.

REQUEST 27:

List, identify and describe all products or services contained in BellSouth Flowthrough Reports under the following categories:

- a) LNP;
- b) UNE;
- c) Business; and
- d) Residence.

OBJECTION:

BellSouth objects to this interrogatory on the grounds that AT&T is seeking information that is only relevant to issues that relate to performance measures and such issues are not being arbitrated in this proceeding. Therefore, this interrogatory will not lead to the discovery of evidence that is either relevant to or will lead to the discovery of admissible evidence related to the remaining issues in this proceeding. If AT&T will identify the issue or issues remaining in this proceeding that this interrogatory relates to, together with an explanation of why the information requested is either relevant to or likely lead to the discovery of admissible evidence related to such issues,

BellSouth would reconsider its position. Until that occurs, however, BellSouth objects to taking the time and incurring the expense of responding to interrogatories that, on their face, do not relate to this docket.

REQUEST 28:

For each month beginning January 2000 through October 2000, across all nine BellSouth states and for Tennessee specifically, identify the volume of BellSouth employee input service requests that failed to be accepted by SOCS as valid service orders and thus did not reach assignable order (AO) status.

OBJECTION:

BellSouth objects to this interrogatory on the ground that the interrogatory will neither lead to the discovery of relevant evidence nor to the discovery of admissible evidence related to the remaining issues in this proceeding. The number of requests for service that BellSouth has received and the number of service orders it has issued have nothing to do with any issue that remains in this proceeding. Furthermore, it appears that BellSouth does not retain this information.

REQUEST 32:

For each month beginning May 2000 through October 2000, across all nine BellSouth states and for Tennessee specifically, provide the total number of CLEC trouble reports received by BellSouth by interface/process.

OBJECTION:

BellSouth objects to this interrogatory on the grounds that AT&T is seeking information that is only relevant to issues that relate to performance measures and such issues are not being arbitrated in this proceeding. Therefore, this interrogatory will not lead to the discovery of evidence that is either relevant to or will lead to the discovery of admissible evidence related to the remaining issues in this proceeding. If AT&T will identify the issue or issues remaining in this proceeding that this interrogatory relates to, together with an explanation of why the information requested is either relevant to or likely lead to the discovery of admissible evidence related to such issues, BellSouth would reconsider its position. Until that occurs, however, BellSouth objects to taking the time and incurring the expense of responding to interrogatories that, on their face, do not relate to this docket.

REQUEST 33:

For each month beginning May 2000 through October 2000, across all nine BellSouth states and for Tennessee specifically,

provide the total number of BellSouth retail trouble reports received by BellSouth by interface/process.

OBJECTION:

BellSouth objects to this interrogatory on the grounds that AT&T is seeking information that is only relevant to issues that relate to performance measures and such issues are not being arbitrated in this proceeding. Therefore, this interrogatory will not lead to the discovery of evidence that is either relevant to or will lead to the discovery of admissible evidence related to the remaining issues in this proceeding. If AT&T will identify the issue or issues remaining in this proceeding that this interrogatory relates to, together with an explanation of why the information requested is either relevant to or likely lead to the discovery of admissible evidence related to such issues, BellSouth would reconsider its position. Until that occurs, however, BellSouth objects to taking the time and incurring the expense of responding to interrogatories that, on their face, do not relate to this docket.

REQUEST 35:

For each month beginning May 2000 through October 2000, across all nine BellSouth states and for Tennessee specifically, identify the volume of BellSouth service requests for retail local exchange services and the volume of service orders (SOs) subsequently issued.

OBJECTION:

BellSouth objects to this interrogatory on the ground that the interrogatory will neither lead to the discovery of relevant evidence nor to the discovery of admissible evidence related to the remaining issues in this proceeding. The number of requests for service that BellSouth has received and the number of service orders it has issued have nothing to do with any issue that remains in this proceeding.

REQUEST 42:

Please describe in detail the methodology utilized by BellSouth to calculate the "Percent Flow Through Service Requests" for BellSouth's retail operations. Provide the methodology for requests placed using the Regional Negotiation System (RNS) and using the Regional Ordering System (ROS).

OBJECTION:

BellSouth objects to this interrogatory on the grounds that AT&T is seeking information that is only relevant to issues that relate to performance measures and such issues are not being arbitrated in this proceeding. Therefore, this interrogatory will

not lead to the discovery of evidence that is either relevant to or will lead to the discovery of admissible evidence related to the remaining issues in this proceeding. If AT&T will identify the issue or issues remaining in this proceeding that this interrogatory relates to, together with an explanation of why the information requested is either relevant to or likely lead to the discovery of admissible evidence related to such issues, BellSouth would reconsider its position. Until that occurs, however, BellSouth objects to taking the time and incurring the expense of responding to interrogatories that, on their face, do not relate to this docket.

REQUEST 46:

Please list all telephone calls made to AT&T by or on behalf of any BellSouth personnel in connection with any hot cut made or attempted since August 15, 2000. For each such call, please state the following:

- a) the date,
- b) the person(s) who made the call,
- c) the AT&T person(s) to whom the call was placed or responded to the call,
- d) the telephone number called,
- e) the beginning and end time of the call, and
- f) a description of the data or information provided to AT&T personnel during the call.

OBJECTION:

BellSouth objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and overreaching. Moreover, the request asks for data that, if it exists, is already in AT&T's possession, since any such calls received by AT&T should be reflected in AT&T's own records. To the extent that AT&T can identify specific hot cuts for which they have no such records, BellSouth will attempt to research those specific "hot cuts" and provide whatever information is available with regard to them.

III. SPECIFIC OBJECTIONS TO REQUESTS FOR PRODUCTION OF DOCUMENTS.

Subject to the foregoing general objections to AT&T's First Interrogatories and Requests for Production of Documents, BellSouth makes the following specific objections to the individual requests for production:

REQUEST NO. 11: Please provide any and all documents that contain, refer, or relate to any and all data that involve performance of hot cuts in Tennessee with start and stop times of the cuts.

OBJECTION: BellSouth objects to this request on the grounds that it is overly broad, vague and would be unduly burdensome to attempt to respond to as requested. Subject to this objection, BellSouth will produce, at the appropriate time and place, any documents that it has been able to identify that appear responsive to this request.

REQUEST NO. 13: Please provide a list of any and all personnel that perform the processing of hot cuts in the provisioning and design phases and their job duties as such.

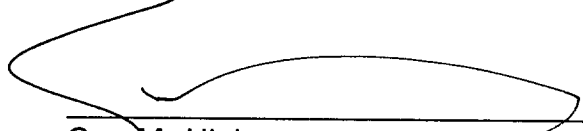
OBJECTION: BellSouth objects to this request on the grounds that it is overly broad, vague and would be unduly burdensome to attempt to respond to as requested.

REQUEST NO. 15: Produce any and all documents, including, but not limited to, all reports, underlying work papers and guidelines that describe or from which one can calculate the percentage of orders for BellSouth's retail business customers that flowed through BellSouth's legacy systems, without human intervention, after input to ROS by a BellSouth employee for each month from May 2000 through October 2000 inclusive.

OBJECTION: BellSouth objects to this interrogatory on the ground that the interrogatory will neither lead to the discovery relevant evidence nor to the discovery of admissible evidence related to the issues remaining in this proceeding.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to read "Guy M. Hicks", is written over a horizontal line.

Guy M. Hicks

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Nashville, Tennessee 37201-3300
(615) 214-6301

R. Douglas Lackey

E. Earl Edenfield

675 W. Peachtree Street, Suite 4300
Atlanta, Georgia 30375

CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

James Lamoureux, Esquire
AT&T
1200 Peachtree St., NE
Atlanta, GA 30309

A handwritten signature in black ink, appearing to read 'James Lamoureux', is written over a horizontal line.